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July 6, 2023

Docket No.: 52-026

ND-23-0163 10 CFR 52.99(c)(1)

U.S. Nuclear Regulatory Commission Document Control Desk Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
ITAAC Closure Notification on Completion of ITAAC 2.2.01.05.i [Index Number 98]

#### Ladies and Gentlemen:

In accordance with 10 CFR 52.99(c)(1), the purpose of this letter is to notify the Nuclear Regulatory Commission (NRC) of the completion of Vogtle Electric Generating Plant (VEGP) Unit 4 Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.2.01.05.i [Index Number 98]. This ITAAC confirms that the Containment System (CNS) equipment identified as seismic Category I or Class 1E in the Combined License (COL) Appendix C, Table 2.2.1-1 are designed and constructed in accordance with applicable requirements.

The closure process for this ITAAC is based on the guidance described in Nuclear Energy Institute (NEI) 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52," which was endorsed by the NRC in Regulatory Guide 1.215.

This letter contains no new regulatory commitments. Southern Nuclear Operating Company (SNC) requests NRC staff confirmation of this determination and publication of the required notice in the Federal Register per 10 CFR 52.99.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,

Jamie M. Coleman

Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4

Completion of ITAAC 2.2.01.05.i [Index Number 98]

JMC/JRB/sfr

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cc:

Regional Administrator, Region II Director, Office of Nuclear Reactor Regulation (NRR)

Director, Vogtle Project Office NRR Senior Resident Inspector – Vogtle 3 & 4

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# Southern Nuclear Operating Company ND-23-0163 Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 4 Completion of ITAAC 2.2.01.05.i [Index Number 98] U.S. Nuclear Regulatory Commission ND-23-0163 Enclosure Page 2 of 18

#### **ITAAC Statement**

#### **Design Commitment:**

- 5. The seismic Category I equipment identified in Table 2.2.1-1 can withstand seismic design basis loads without loss of structural integrity and safety function.
- 6.a) The Class 1E equipment identified in Table 2.2.1-1 as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function.
- 6.d) The non-Class 1E electrical penetrations identified in Table 2.2.1-1 as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of containment pressure boundary integrity.

## Inspections, Tests, Analyses:

- i) Inspection will be performed to verify that the seismic Category I equipment and valves identified in Table 2.2.1-1 are located on the Nuclear Island.
- ii) Type tests, analyses, or a combination of type tests and analyses of seismic Category I equipment will be performed.
- iii) Inspection will be performed for the existence of a report verifying that the as-built equipment including anchorage is seismically bounded by the tested or analyzed conditions.
- i) Type tests, analyses, or a combination of type tests and analyses will be performed on Class 1E equipment located in a harsh environment.
- ii) Inspection will be performed of the as-built Class 1E equipment and the associated wiring, cables, and terminations located in a harsh environment.
- i) Type tests, analyses, or a combination of type tests and analyses will be performed on non-Class 1E electrical penetrations located in a harsh environment.
- ii) Inspection will be performed of the as-built non-Class 1E electrical penetrations located in a harsh environment.

#### Acceptance Criteria:

- i) The seismic Category I equipment identified in Table 2.2.1-1 is located on the Nuclear Island.
- ii) A report exists and concludes that the seismic Category I equipment can withstand seismic design basis dynamic loads without loss of structural integrity and safety function.
- iii) The as-built equipment including anchorage is seismically bounded by the tested or analyzed conditions.

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- i) A report exists and concludes that the Class 1E equipment identified in Table 2.2.1-1 as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function.
- ii) A report exists and concludes that the as-built Class 1E equipment and the associated wiring, cables, and terminations identified in Table 2.2.1-1 as being qualified for a harsh environment are bounded by type tests, analyses, or a combination of type tests and analyses.
- i) A report exists and concludes that the non-Class 1E electrical penetrations identified in Table 2.2.1-1 as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of containment pressure boundary integrity.
- ii) A report exists and concludes that the as-built non-Class 1E electrical penetrations identified in Table 2.2.1-1 as being qualified for a harsh environment are bounded by type tests, analyses, or a combination of type tests and analyses.

### **ITAAC Determination Basis**

This ITAAC requires that inspections, tests, and analyses be performed and documented to ensure the Containment System (CNS) equipment identified as seismic Category I or Class 1E in the Combined License (COL) Appendix C, Table 2.2.1-1 (the Table) are designed and constructed in accordance with applicable requirements.

i) The seismic Category I equipment identified in Table 2.2.1-1 is located on the Nuclear Island

To assure that seismic Category I equipment can withstand seismic design basis loads without loss of safety function, all the equipment in the Table is designed to be located on the seismic Category I Nuclear Island. In accordance with Equipment Qualification (EQ) Walkdown ITAAC Guideline (Reference 1) and Equipment Qualification (EQ) Installation Documentation Guideline (Reference 13), an inspection was conducted of the CNS to confirm the satisfactory installation of the seismically qualified equipment. The inspection included verification of equipment make/model/serial number and verification of equipment location (Building, Elevation, Room). The EQ As-Built Reconciliation Reports (EQRR) (Reference 2) identified in Attachment A documented the results of the inspection and concluded that the seismic Category I equipment is located on the Nuclear Island.

ii) A report exists and concludes that the seismic Category I equipment can withstand seismic design basis dynamic loads without loss of structural integrity and safety function.

Seismic Category I equipment in the Table require type tests and/or analyses to demonstrate structural integrity and operability. The structural integrity of the seismic Category I valves, as well as other passive seismic Category I mechanical equipment, was demonstrated by analysis in accordance with American Society of Mechanical Engineers (ASME) Code Section III (Reference 3). The functionality of the subset of active safety-related valves under seismic loads was determined using the guidance of ASME QME-1-2007 (Reference 4).

Safety-related (Class 1E) electrical equipment in the Table was seismically qualified by type testing combined with an analysis in accordance with Institute of Electrical and Electronics

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Engineers (IEEE) Standard 344-1987 (Reference 5). This equipment includes safety-related (Class 1E) field sensors and the safety-related active valve accessories such as electric actuators, position switches, pilot solenoid valves and electrical connector assemblies. The specific qualification method (i.e., type testing, analysis, or combination) used for each equipment in the Table is identified in Attachment A. Additional information about the methods used to qualify AP1000 safety-related equipment is provided in the Updated Final Safety Analysis Report (UFSAR) Appendix 3D (Reference 6). The EQ Reports (Reference 7) identified in Attachment A contain applicable test reports and associated documentation and conclude that the seismic Category I equipment can withstand seismic design basis dynamic loads without loss of structural integrity and safety function.

iii) The as-built equipment including anchorage is seismically bounded by the tested or analyzed conditions.

An inspection (References 1 and 13) was conducted to confirm the satisfactory installation of the seismically qualified equipment in the Table. The inspection verified the equipment make/model/serial number, as-designed equipment mounting orientation, anchorage and clearances, and electrical and other interfaces. The documentation of the installed configuration of seismically qualified equipment includes photographs and/or sketches/drawings of equipment/mounting/interfaces.

As part of the seismic qualification program, consideration is given to the definition of the clearances needed around the equipment mounted in the plant to permit the equipment to move during a postulated seismic event without causing impact between adjacent pieces of safety-related equipment. When required, seismic testing by measuring the maximum dynamic relative displacement of the top and bottom of the equipment was performed. EQ Reports (Reference 7) identify the equipment mounting employed for qualification and establish interface requirements for assuring that subsequent in-plant installation does not degrade the established qualification. Interface requirements are defined based on the test configuration and other design requirements.

Attachment A identifies the EQRR (Reference 2) completed to verify that the as-built seismic Category I equipment listed in the Table, including anchorage, is seismically bounded by the tested or analyzed conditions, IEEE Standard 344-1987 (Reference 5), and NRC Regulatory Guide (RG) 1.100 (Reference 8).

i) A report exists and concludes that the Class 1E equipment identified in Table 2.2.1-1 as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function.

The harsh environment Class 1E equipment in the Table are qualified by type testing and/or analyses. Class 1E electrical equipment type testing was performed in accordance with IEEE Standard 323-1974 (Reference 9) and RG 1.89 (Reference 10) to meet the requirements of 10 CFR 50.49. Type testing of safety-related equipment meets the requirements of 10 CFR Part 50, Appendix A, General Design Criterion 4. Attachment A identifies the EQ program and specific qualification method for each safety-related mechanical or Class 1E electrical equipment located in a harsh environment. Additional information about the methods used to qualify AP1000 safety-related equipment is provided in the UFSAR Appendix 3D (Reference 6). EQ Reports (Reference 7) identified in Attachment A contains applicable test reports and

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associated documentation and conclude that the equipment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function.

ii) A report exists and concludes that the as-built Class 1E equipment and the associated wiring, cables, and terminations identified in Table 2.2.1-1 as being qualified for a harsh environment are bounded by type tests, analyses, or a combination of type tests and analyses.

An inspection (References 1 and 13) was conducted of the CNS to confirm the satisfactory installation of the Class 1E equipment in the Table. The inspection verified the equipment location, make/model/serial number, as-designed equipment mounting, wiring, cables, and terminations, and confirms that the environmental conditions for the zone (Attachment A) in which the equipment is mounted are bounded by the tested and/or analyzed conditions. It also documents the installed configuration with photographs or sketches/drawings of equipment mounting and connections. The EQRR (Reference 2) identified in Attachment A documents this inspection and concludes that the as-built harsh environment Class 1E equipment and the associated wiring, cables, and terminations are bounded by the qualified configuration and IEEE Standard 323-1974 (Reference 9).

i) A report exists and concludes that the non-Class 1E electrical penetrations identified in Table 2.2.1-1 as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of containment pressure boundary integrity.

The harsh environment non-Class 1E electrical penetrations in the Table are qualified by type testing and/or analyses. Non-Class 1E electrical penetration type testing is performed in accordance with IEEE Standard 323-1974 (Reference 9), IEEE Standard 317-1983 (Reference 11), and RG 1.89 (Reference 10) to meet the requirements of 10 CFR 50.49. Attachment A identifies the EQ program and specific qualification method for each non-Class 1E electrical penetration located in a harsh environment. Additional information about the methods used to qualify electrical penetrations supplied for the AP1000 is provided in the UFSAR Appendix 3D (Reference 6). EQ reports (Reference 7) identified in Attachment A contain applicable test reports and associated documentation and conclude that the electrical penetrations can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of containment pressure boundary integrity.

ii) A report exists and concludes that the as-built non-Class 1E electrical penetrations identified in Table 2.2.1-1 as being qualified for a harsh environment are bounded by type tests, analyses, or a combination of type tests and analyses.

An inspection (References 1 and 13) was conducted of the CNS to confirm the satisfactory installation of the non-Class 1E electrical penetrations in the Table. The inspection verified the penetration location, make/model/serial number, and as-designed penetration mounting, and confirms that the environmental conditions for the zone (Attachment A) in which the penetration is mounted are bounded by the tested and/or analyzed conditions. It also documented the installed configuration with photographs or sketches/drawings of penetration mounting. The EQRR (Reference 2) identified in Attachment A documented this inspection and concluded that the as-built harsh environment non-Class 1E electrical penetrations are bounded by the qualified configuration and IEEE Standard 323-1974 (Reference 9), and IEEE Standard 317-1983 (Reference 11).

Together, these reports (References 2 and 7) provided evidence that the ITAAC Acceptance Criteria requirements are met:

- The seismic Category I equipment identified in Table 2.2.1-1 is located on the Nuclear Island;
- A report exists and concludes that the seismic Category I equipment can withstand seismic design basis dynamic loads without loss of structural integrity and safety function;
- The as-built equipment including anchorage is seismically bounded by the tested or analyzed conditions;
- A report exists and concludes that the Class 1E equipment identified in Table 2.2.1-1 as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of safety function for the time required to perform the safety function;
- A report exists and concludes that the as-built Class 1E equipment and the associated wiring, cables, and terminations identified in Table 2.2.1-1 as being qualified for a harsh environment are bounded by type tests, analyses, or a combination of type tests and analyses;
- A report exists and concludes that the non-Class 1E electrical penetrations identified in Table 2.2.1-1 as being qualified for a harsh environment can withstand the environmental conditions that would exist before, during, and following a design basis accident without loss of containment pressure boundary integrity; and
- A report exists and concludes that the as-built non-Class 1E electrical penetrations identified in Table 2.2.1-1 as being qualified for a harsh environment are bounded by type tests, analyses, or a combination of type tests and analyses.

References 2 and 7 are available for NRC inspection as part of Unit 4 ITAAC 2.2.01.05.i Completion Package (Reference 12).

#### **ITAAC Finding Review**

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company (SNC) performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This finding review, which included now-consolidated ITAAC Indexes 99, 100, 101, 102, 105 and 106, found three closed Notices of Nonconformance (NON):

- 1) 99901412/2012-201-02 (closed) ML16357A725
- 2) 99901415/2012-201-01 (closed) ML15148A419
- 3) 99901415/2012-201-02 (closed) ML15148A419

#### **ITAAC Completion Statement**

Based on the above information, SNC hereby notifies the NRC that ITAAC 2.2.01.05.i was performed for VEGP Unit 4 and that the prescribed acceptance criteria are met.

Systems, structures, and components verified as part of this ITAAC are being maintained in their as-designed, ITAAC compliant condition in accordance with approved plant programs and procedures.

### References (available for NRC inspection)

- 1. ND-RA-001-014, "EQ ITAAC As-Built Walkdown ITAAC Guideline"
- 2. EQ As-Built Reconciliation Reports (EQRR) as identified in Attachment A for Unit 4
- 3. American Society of Mechanical Engineers (ASME) Boiler and Pressure Vessel (B&PV) Code, Section III, "Rules for Construction of Nuclear Power Plant Components", 1998 Edition with 2000 Addenda
- 4. ASME QME-1-2007, "Qualification of Active Mechanical Equipment Used in Nuclear Power Plants", The American Society of Mechanical Engineers, June 2007
- 5. IEEE Standard 344-1987, "IEEE Recommended Practices for Seismic Qualification of Class 1E Equipment for Nuclear Power Generating Stations"
- 6. Vogtle 3&4 Updated Final Safety Analysis Report Appendix 3D, "Methodology for Qualifying AP1000 Safety-Related Electrical and Mechanical Equipment"
- 7. Equipment Qualification (EQ) Reports as identified in Attachment A
- 8. Regulatory Guide 1.100, Rev. 2, "Seismic Qualification of Electric and Mechanical Equipment for Nuclear Power Plants"
- 9. IEEE Standard 323-1974, "IEEE Standard for Qualifying Class 1E Equipment for Nuclear Power Generating Stations"
- 10. Regulatory Guide 1.89, Rev 1, "Environmental Qualification of Certain Electric Equipment Important to Safety for Nuclear Power Plants"
- 11. IEEE Standard 317-1983, "IEEE Standard for Electric Penetration Assemblies in Containment Structures for Nuclear Power Generating Stations"
- 12. 2.2.01.05.i-U4-CP-Rev0, "ITAAC Completion Package"
- 13. ND- RA-001-016, "EQ ITAAC As-built Installation Documentation Guideline," Version 1.0

## Attachment A

System: Containment System

| Equipment Name +  | Tag No. †       | Seismic<br>Cat. I * | Class<br>1E/Qual.<br>For Harsh<br>Envir. +3 | Envir.<br>Zone <sup>1</sup> | Envir<br>Qual<br>Program <sup>2</sup> | Type of<br>Qual.                 | EQ Reports<br>(Reference 7)            | As-Built EQRR<br>(Reference 2) |
|---|-----------------|---------------------|---|-----------------------------|---------------------------------------|----------------------------------|--|--------------------------------|
| Service Air Supply Outside<br>Containment Isolation Valve   | CAS-PL-<br>V204 | Yes                 | -/-   | N/A                         | N/A                                   | Type Testing & Analysis          | SV4-PV10-VBR-008 /<br>SV4-PV10-VBR-007 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Service Air Supply Inside<br>Containment Isolation Check<br>Valve   | CAS-PL-<br>V205 | Yes                 | -/-   | N/A                         | N/A                                   | Analysis                         | SV4-PV03-VBR-002 /<br>SV4-PV03-VBR-001 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Instrument Air Supply Outside Containment Isolation Valve   | CAS-PL-<br>V014 | Yes                 | Yes/No                                      | N/A                         | N/A                                   | Type Testing & Analysis          | SV4-PV10-VBR-004 /<br>SV4-PV10-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Instrument Air Supply Inside<br>Containment Isolation Check<br>Valve  | CAS-PL-<br>V015 | Yes                 | -/-   | N/A                         | N/A                                   | Analysis                         | SV4-PV02-VBR-016 /<br>SV4-PV02-VBR-015 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Component Cooling Water<br>System (CCS) Containment<br>Isolation Motor-operated<br>Valve (MOV) – Inlet Line<br>Outside Reactor Containment<br>(ORC) | CCS-PL-<br>V200 | Yes                 | Yes/No                                      | N/A                         | N/A                                   | Type<br>Testing<br>&<br>Analysis | SV4-PV11-VBR-006 /<br>SV4-PV11-VBR-005 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| CCS Containment Isolation<br>Check Valve – Inlet Line<br>Inside Reactor Containment<br>(IRC)  | CCS-PL-<br>V201 | Yes                 | -/-   | N/A                         | N/A                                   | Analysis                         | SV4-PV03-VBR-014 /<br>SV4-PV03-VBR-013 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |

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| Equipment Name +   | Tag No. †       | Seismic<br>Cat. I <sup>+</sup> | Class<br>1E/Qual.<br>For Harsh<br>Envir. +3 | Envir.<br>Zone <sup>1</sup> | Envir<br>Qual<br>Program <sup>2</sup> | Type of<br>Qual.                 | EQ Reports<br>(Reference 7)            | As-Built EQRR<br>(Reference 2) |
|--|-----------------|--------------------------------|---|-----------------------------|---------------------------------------|----------------------------------|--|--------------------------------|
| CCS Containment Isolation<br>MOV – Outlet Line IRC                     | CCS-PL-<br>V207 | Yes                            | Yes/Yes                                     | 1                           | M * E                                 | Type<br>Testing<br>&<br>Analysis | SV4-PV11-VBR-006 /<br>SV4-PV11-VBR-005 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| CCS Containment Isolation<br>MOV – Outlet Line ORC                     | CCS-PL-<br>V208 | Yes                            | Yes/No                                      | N/A                         | N/A                                   | Type Testing & Analysis          | SV4-PV11-VBR-006 /<br>SV4-PV11-VBR-005 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| CCS Containment Isolation<br>Relief Valve – Outlet Line<br>IRC         | CCS-PL-<br>V220 | Yes                            | -/-   | N/A                         | N/A                                   | Type<br>Testing<br>&<br>Analysis | SV4-PV16-VBR-002 /<br>SV4-PV16-VBR-001 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Demineralized Water Supply<br>Containment Isolation Valve<br>ORC       | DWS-PL-<br>V244 | Yes                            | -/-   | N/A                         | N/A                                   | Type<br>Testing<br>&<br>Analysis | SV4-PV11-VBR-002 /<br>SV4-PV11-VBR-001 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Demineralized Water Supply<br>Containment Isolation Check<br>Valve IRC | DWS-PL-<br>V245 | Yes                            | -/-   | N/A                         | N/A                                   | Analysis                         | SV4-PV02-VBR-016 /<br>SV4-PV02-VBR-015 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Fuel Transfer Tube   | FHS-FT-<br>01   | Yes                            | -/-   | N/A                         | N/A                                   | Analysis                         | SV4-FT01-S3R-001                       | 2.2.01.05.i-U4-<br>EQRR-PCD002 |
| Fuel Transfer Tube Isolation<br>Valve                                  | FHS-PL-<br>V001 | Yes                            | -/-   | N/A                         | N/A                                   | Type Testing & Analysis          | SV4-FH06-VBR-002 /<br>SV4-FH06-VBR-001 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Fire Water Containment<br>Supply Isolation Valve –<br>Outside          | FPS-PL-<br>V050 | Yes                            | -/-   | N/A                         | N/A                                   | Type Testing & Analysis          | SV4-PV11-VBR-002 /<br>SV4-PV11-VBR-001 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |

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| Equipment Name +   | Tag No. †       | Seismic<br>Cat. I <sup>+</sup> | Class<br>1E/Qual.<br>For Harsh<br>Envir. +3 | Envir.<br>Zone <sup>1</sup> | Envir<br>Qual<br>Program <sup>2</sup> | Type of<br>Qual.                 | EQ Reports<br>(Reference 7)            | As-Built EQRR<br>(Reference 2) |
|--|-----------------|--------------------------------|---|-----------------------------|---------------------------------------|----------------------------------|--|--------------------------------|
| Fire Water Containment<br>Isolation Supply Check Valve<br>– Inside                                   | FPS-PL-<br>V052 | Yes                            | -/-   | N/A                         | N/A                                   | Analysis                         | SV4-PV03-VBR-014 /<br>SV4-PV03-VBR-013 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Spent Fuel Pool Cooling<br>System (SFS) Discharge Line<br>Containment Isolation Check<br>Valve – IRC | SFS-PL-<br>V037 | Yes                            | -/-   | N/A                         | N/A                                   | Analysis                         | SV4-PV03-VBR-002 /<br>SV4-PV03-VBR-001 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| SFS Discharge Line<br>Containment Isolation MOV –<br>ORC   | SFS-PL-<br>V038 | Yes                            | Yes/No                                      | N/A                         | N/A                                   | Type Testing & Analysis          | SV4-PV11-VBR-006 /<br>SV4-PV11-VBR-005 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| SFS Suction Line<br>Containment Isolation MOV –<br>IRC   | SFS-PL-<br>V034 | Yes                            | Yes/Yes                                     | 1                           | M * E                                 | Type Testing & Analysis          | SV4-PV11-VBR-006 /<br>SV4-PV11-VBR-005 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| SFS Suction Line<br>Containment Isolation MOV –<br>ORC   | SFS-PL-<br>V035 | Yes                            | Yes/No                                      | N/A                         | N/A                                   | Type Testing & Analysis          | SV4-PV11-VBR-006 /<br>SV4-PV11-VBR-005 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| SFS Suction Line<br>Containment Isolation Relief<br>Valve – IRC                                      | SFS-PL-<br>V067 | Yes                            | -/-   | N/A                         | N/A                                   | Type<br>Testing<br>&<br>Analysis | SV4-PV16-VBR-002 /<br>SV4-PV16-VBR-001 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Containment Purge Inlet<br>Containment Isolation Valve<br>– ORC                                      | VFS-PL-<br>V003 | Yes                            | Yes/No                                      | N/A                         | N/A                                   | Type<br>Testing<br>&<br>Analysis | SV4-PV11-VBR-004 /<br>SV4-PV11-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Containment Purge Inlet<br>Containment Isolation Valve<br>– IRC                                      | VFS-PL-<br>V004 | Yes                            | Yes/Yes                                     | 1                           | M * E                                 | Type<br>Testing<br>&<br>Analysis | SV4-PV11-VBR-004 /<br>SV4-PV11-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |

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| Equipment Name +  | Tag No. †        | Seismic<br>Cat. I <sup>+</sup> | Class<br>1E/Qual.<br>For Harsh<br>Envir. +3 | Envir.<br>Zone <sup>1</sup> | Envir<br>Qual<br>Program <sup>2</sup> | Type of Qual.                    | EQ Reports<br>(Reference 7)            | As-Built EQRR<br>(Reference 2) |
|---|------------------|--------------------------------|---|-----------------------------|---------------------------------------|----------------------------------|--|--------------------------------|
| Integrated Leak Rate Testing<br>Vent Discharge Containment<br>Isolation Valve – ORC | VFS-PL-<br>V008  | Yes                            | -/-   | N/A                         | N/A                                   | Type<br>Testing<br>&<br>Analysis | SV4-PV02-VBR-010 /<br>SV4-PV02-VBR-009 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Containment Purge<br>Discharge Containment<br>Isolation Valve – IRC                 | VFS-PL-<br>V009  | Yes                            | Yes/Yes                                     | 1                           | M*ES                                  | Type Testing & Analysis          | SV4-PV11-VBR-004 /<br>SV4-PV11-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Containment Purge<br>Discharge Containment<br>Isolation Valve – ORC                 | VFS-PL-<br>V010  | Yes                            | Yes/No                                      | N/A                         | N/A                                   | Type Testing & Analysis          | SV4-PV11-VBR-004 /<br>SV4-PV11-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Vacuum Relief Containment<br>Isolation A MOV- ORC                                   | VFS-PL-<br>V800A | Yes                            | Yes/No                                      | N/A                         | N/A                                   | Type Testing & Analysis          | SV4-PV11-VBR-006 /<br>SV4-PV11-VBR-005 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Vacuum Relief Containment<br>Isolation B MOV- ORC                                   | VFS-PL-<br>V800B | Yes                            | Yes/No                                      | N/A                         | N/A                                   | Type Testing & Analysis          | SV4-PV11-VBR-006 /<br>SV4-PV11-VBR-005 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Vacuum Relief Containment<br>Isolation Check Valve A –<br>IRC                       | VFS-PL-<br>V803A | Yes                            | -/-   | N/A                         | N/A                                   | Type Testing & Analysis          | SV4-PV18-VBR-002 /<br>SV4-PV18-VBR-001 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Vacuum Relief Containment<br>Isolation Check Valve B –<br>IRC                       | VFS-PL-<br>V803B | Yes                            | -/-   | N/A                         | N/A                                   | Type Testing & Analysis          | SV4-PV18-VBR-002 /<br>SV4-PV18-VBR-001 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |

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| Equipment Name +  | Tag No. †       | Seismic<br>Cat. I <sup>+</sup> | Class<br>1E/Qual.<br>For Harsh<br>Envir. +3 | Envir.<br>Zone <sup>1</sup> | Envir<br>Qual<br>Program <sup>2</sup> | Type of<br>Qual.                 | EQ Reports<br>(Reference 7)            | As-Built EQRR<br>(Reference 2) |
|---|-----------------|--------------------------------|---|-----------------------------|---------------------------------------|----------------------------------|--|--------------------------------|
| Fan Coolers Return<br>Containment Isolation Valve<br>– IRC                              | VWS-PL-<br>V082 | Yes                            | Yes/Yes                                     | 1                           | M*ES                                  | Type Testing & Analysis          | SV4-PV11-VBR-004 /<br>SV4-PV11-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Fan Coolers Return<br>Containment Isolation Valve<br>– ORC                              | VWS-PL-<br>V086 | Yes                            | Yes/No                                      | N/A                         | N/A                                   | Type Testing & Analysis          | SV4-PV11-VBR-004 /<br>SV4-PV11-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Fan Coolers Return<br>Containment Isolation Relief<br>Valve – IRC                       | VWS-PL-<br>V080 | Yes                            | -/-   | N/A                         | N/A                                   | Type Testing & Analysis          | SV4-PV16-VBR-002 /<br>SV4-PV16-VBR-001 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Fan Coolers Supply<br>Containment Isolation Valve<br>– ORC                              | VWS-PL-<br>V058 | Yes                            | Yes/No                                      | N/A                         | N/A                                   | Type Testing & Analysis          | SV4-PV11-VBR-004 /<br>SV4-PV11-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Fan Coolers Supply<br>Containment Isolation Check<br>Valve – IRC                        | VWS-PL-<br>V062 | Yes                            | -/-   | N/A                         | N/A                                   | Analysis                         | SV4-PV03-VBR-002 /<br>SV4-PV03-VBR-001 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Reactor Coolant Drain Tank<br>(RCDT) Gas Outlet<br>Containment Isolation Valve<br>– IRC | WLS-PL-<br>V067 | Yes                            | Yes/Yes                                     | 1                           | M*ES                                  | Type<br>Testing<br>&<br>Analysis | SV4-PV14-VBR-002 /<br>SV4-PV14-VBR-001 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| RCDT Gas Outlet<br>Containment Isolation Valve<br>– ORC                                 | WLS-PL-<br>V068 | Yes                            | Yes/No                                      | N/A                         | N/A                                   | Type<br>Testing<br>&<br>Analysis | SV4-PV14-VBR-002 /<br>SV4-PV14-VBR-001 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Sump Discharge<br>Containment Isolation Valve<br>– IRC                                  | WLS-PL-<br>V055 | Yes                            | Yes/Yes                                     | 1                           | M*ES                                  | Type<br>Testing<br>&<br>Analysis | SV4-PV10-VBR-006 /<br>SV4-PV10-VBR-005 | 2.2.01.05.i-U4-<br>EQRR-PCD001 |

| Equipment Name +  | Tag No. †       | Seismic<br>Cat. I <sup>+</sup> | Class<br>1E/Qual.<br>For Harsh<br>Envir. +3 | Envir.<br>Zone <sup>1</sup> | Envir<br>Qual<br>Program <sup>2</sup> | Type of<br>Qual.                 | EQ Reports<br>(Reference 7)              | As-Built EQRR<br>(Reference 2) |
|---|-----------------|--------------------------------|---|-----------------------------|---------------------------------------|----------------------------------|--|--------------------------------|
| Sump Discharge<br>Containment Isolation Valve<br>– ORC        | WLS-PL-<br>V057 | Yes                            | Yes/No                                      | N/A                         | N/A                                   | Type<br>Testing<br>&<br>Analysis | SV4-PV10-VBR-006 /<br>SV4-PV10-VBR-005   | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Sump Discharge<br>Containment Isolation Relief<br>Valve – IRC | WLS-PL-<br>V058 | Yes                            | -/-   | N/A                         | N/A                                   | Type Testing & Analysis          | SV4-PV16-VBR-002 /<br>SV4-PV16-VBR-001   | 2.2.01.05.i-U4-<br>EQRR-PCD001 |
| Spare Penetration   | CNS-PY-<br>C01  | Yes                            | -/-   | N/A                         | N/A                                   | Analysis                         | SV4-MV50-S3R-100<br>SV4-CNS-S3R-001      | 2.2.01.05.i-U4-<br>EQRR-PCD002 |
| Spare Penetration   | CNS-PY-<br>C02  | Yes                            | -/-   | N/A                         | N/A                                   | Analysis                         | SV4-MV50-S3R-100<br>SV4-CNS-S3R-001      | 2.2.01.05.i-U4-<br>EQRR-PCD002 |
| Spare Penetration   | CNS-PY-<br>C03  | Yes                            | -/-   | N/A                         | N/A                                   | Analysis                         | SV4-MV50-S3R-100<br>SV4-CNS-S3R-001      | 2.2.01.05.i-U4-<br>EQRR-PCD002 |
| Main Equipment Hatch  | CNS-MY-<br>Y01  | Yes                            | -/-   | N/A                         | N/A                                   | Type<br>Testing<br>&<br>Analysis | SV4-MV50-VBR-002 /<br>SV4-MV50-VBR-001 / | 2.2.01.05.i-U4-<br>EQRR-PCD002 |
| Maintenance Hatch   | CNS-MY-<br>Y02  | Yes                            | -/-   | N/A                         | N/A                                   | Type Testing & Analysis          | SV4-MV50-VBR-002 /<br>SV4-MV50-VBR-001 / | 2.2.01.05.i-U4-<br>EQRR-PCD002 |
| Upper Personnel Hatch   | CNS-MY-<br>Y03  | Yes                            | -/-   | N/A                         | N/A                                   | Type Testing & Analysis          | SV4-MV50-VBR-002 /<br>SV4-MV50-VBR-001 / | 2.2.01.05.i-U4-<br>EQRR-PCD002 |
| Lower Personnel Hatch   | CNS-MY-<br>Y04  | Yes                            | -/-   | N/A                         | N/A                                   | Type Testing & Analysis          | SV4-MV50-VBR-002 /<br>SV4-MV50-VBR-001 / | 2.2.01.05.i-U4-<br>EQRR-PCD002 |

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| Equipment Name +           | Tag No. †       | Seismic<br>Cat. I <sup>+</sup> | Class<br>1E/Qual.<br>For Harsh<br>Envir. +3 | Envir.<br>Zone <sup>1</sup> | Envir<br>Qual<br>Program <sup>2</sup> | Type of Qual.                    | EQ Reports<br>(Reference 7)            | As-Built EQRR<br>(Reference 2) |
|----------------------------|-----------------|--------------------------------|---|-----------------------------|---------------------------------------|----------------------------------|--|--------------------------------|
| Containment Vessel         | CNS-MV-<br>01   | Yes                            | -/-   | N/A                         | N/A                                   | Analysis                         | SV4-MV50-S3R-100                       | 2.2.01.05.i-U4-<br>EQRR-PCD002 |
| Electrical Penetration P03 | DAS-EY-<br>P03Z | Yes                            | No/Yes                                      | 7                           | E*S                                   | Type Testing & Analysis          | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD003 |
| Electrical Penetration P01 | ECS-EY-<br>P01X | Yes                            | No/Yes                                      | 4                           | E*S                                   | Type Testing & Analysis          | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD003 |
| Electrical Penetration P02 | ECS-EY-<br>P02X | Yes                            | No/Yes                                      | 4                           | E*S                                   | Type Testing & Analysis          | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD003 |
| Electrical Penetration P06 | ECS-EY-<br>P06Y | Yes                            | No/Yes                                      | 4                           | E * S                                 | Type Testing & Analysis          | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD003 |
| Electrical Penetration P07 | ECS-PY-<br>P07X | Yes                            | No/Yes                                      | 4                           | E * S                                 | Type Testing & Analysis          | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD003 |
| Electrical Penetration P09 | ECS-EY-<br>P09W | Yes                            | No/Yes                                      | 4                           | E*S                                   | Type Testing & Analysis          | SV4-EY01-VBR-002 /<br>SV4-EY01-VBR-001 | 2.2.01.05.i-U4-<br>EQRR-PCD003 |
| Electrical Penetration P10 | ECS-EY-<br>P10W | Yes                            | No/Yes                                      | 4                           | E*S                                   | Type<br>Testing<br>&<br>Analysis | SV4-EY01-VBR-002 /<br>SV4-EY01-VBR-001 | 2.2.01.05.i-U4-<br>EQRR-PCD003 |

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| Equipment Name +           | Tag No. †        | Seismic<br>Cat. I <sup>+</sup> | Class<br>1E/Qual.<br>For Harsh<br>Envir. +3 | Envir.<br>Zone <sup>1</sup> | Envir<br>Qual<br>Program <sup>2</sup> | Type of Qual.                    | EQ Reports<br>(Reference 7)            | As-Built EQRR<br>(Reference 2) |
|----------------------------|------------------|--------------------------------|---|-----------------------------|---------------------------------------|----------------------------------|--|--------------------------------|
| Electrical Penetration P11 | IDSA-EY-<br>P11Z | Yes                            | Yes/Yes                                     | 2                           | E*S                                   | Type<br>Testing<br>&<br>Analysis | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD004 |
| Electrical Penetration P12 | IDSA-EY-<br>P12Y | Yes                            | Yes/Yes                                     | 2                           | E*S                                   | Type Testing & Analysis          | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD004 |
| Electrical Penetration P13 | IDSA-EY-<br>P13Y | Yes                            | Yes/Yes                                     | 2                           | E*S                                   | Type<br>Testing<br>&<br>Analysis | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD004 |
| Electrical Penetration P14 | IDSD-EY-<br>P14Z | Yes                            | Yes/Yes                                     | 2                           | E*S                                   | Type Testing & Analysis          | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD004 |
| Electrical Penetration P15 | IDSD-EY-<br>P15Y | Yes                            | Yes/Yes                                     | 2                           | E*S                                   | Type Testing & Analysis          | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD004 |
| Electrical Penetration P16 | IDSD-EY-<br>P16Y | Yes                            | Yes/Yes                                     | 2                           | E*S                                   | Type Testing & Analysis          | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD004 |
| Electrical Penetration P17 | ECS-EY-<br>P17X  | Yes                            | No/Yes                                      | 4                           | E*S                                   | Type Testing & Analysis          | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD003 |

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| Equipment Name †           | Tag No. †       | Seismic<br>Cat. I <sup>+</sup> | Class<br>1E/Qual.<br>For Harsh<br>Envir. +3 | Envir.<br>Zone <sup>1</sup> | Envir<br>Qual<br>Program <sup>2</sup> | Type of<br>Qual.        | EQ Reports<br>(Reference 7)            | As-Built EQRR<br>(Reference 2) |
|----------------------------|-----------------|--------------------------------|---|-----------------------------|---------------------------------------|-------------------------|--|--------------------------------|
| Electrical Penetration P18 | ECS-EY-<br>P18X | Yes                            | No/Yes                                      | 4                           | E * S                                 | Type Testing & Analysis | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD003 |
| Electrical Penetration P19 | ECS-EY-<br>P19Z | Yes                            | No/Yes                                      | 4                           | E*S                                   | Type Testing & Analysis | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD003 |
| Electrical Penetration P20 | ECS-EY-<br>P20Z | Yes                            | No/Yes                                      | 4                           | E*S                                   | Type Testing & Analysis | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD003 |
| Electrical Penetration P21 | EDS-EY-<br>P21Z | Yes                            | No/Yes                                      | 4                           | E * S                                 | Type Testing & Analysis | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD003 |
| Electrical Penetration P22 | ECS-EY-<br>P22X | Yes                            | No/Yes                                      | 4                           | E * S                                 | Type Testing & Analysis | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD003 |
| Electrical Penetration P23 | ECS-EY-<br>P23X | Yes                            | No/Yes                                      | 4                           | E * S                                 | Type Testing & Analysis | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD003 |
| Electrical Penetration P24 | ECS-EY-<br>P24  | Yes                            | No/Yes                                      | 4                           | E * S                                 | Type Testing & Analysis | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD003 |

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| Equipment Name +           | Tag No. †        | Seismic<br>Cat. I <sup>+</sup> | Class<br>1E/Qual.<br>For Harsh<br>Envir. +3 | Envir.<br>Zone <sup>1</sup> | Envir<br>Qual<br>Program <sup>2</sup> | Type of<br>Qual.                 | EQ Reports<br>(Reference 7)            | As-Built EQRR<br>(Reference 2) |
|----------------------------|------------------|--------------------------------|---|-----------------------------|---------------------------------------|----------------------------------|--|--------------------------------|
| Electrical Penetration P25 | ECS-EY-<br>P25W  | Yes                            | No/Yes                                      | 4                           | E * S                                 | Type Testing & Analysis          | SV4-EY01-VBR-002 /<br>SV4-EY01-VBR-001 | 2.2.01.05.i-U4-<br>EQRR-PCD003 |
| Electrical Penetration P26 | ECS-EY-<br>P26W  | Yes                            | No/Yes                                      | 4                           | E * S                                 | Type Testing & Analysis          | SV4-EY01-VBR-002 /<br>SV4-EY01-VBR-001 | 2.2.01.05.i-U4-<br>EQRR-PCD003 |
| Electrical Penetration P27 | IDSC-EY-<br>P27Z | Yes                            | Yes/Yes                                     | 2                           | E * S                                 | Type Testing & Analysis          | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD004 |
| Electrical Penetration P28 | IDSC-EY-<br>P28Y | Yes                            | Yes/Yes                                     | 2                           | E * S                                 | Type<br>Testing<br>&<br>Analysis | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD004 |
| Electrical Penetration P29 | IDSC-EY-<br>P29Y | Yes                            | Yes/Yes                                     | 2                           | E * S                                 | Type Testing & Analysis          | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD004 |
| Electrical Penetration P30 | IDSB-EY-<br>P30Z | Yes                            | Yes/Yes                                     | 2                           | E * S                                 | Type<br>Testing<br>&<br>Analysis | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD004 |
| Electrical Penetration P31 | IDSB-EY-<br>P31Y | Yes                            | Yes/Yes                                     | 2                           | E*S                                   | Type<br>Testing<br>&<br>Analysis | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD004 |

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| Equipment Name +           | Tag No. †        | Seismic<br>Cat. I <sup>+</sup> | Class<br>1E/Qual.<br>For Harsh<br>Envir. +3 | Envir.<br>Zone <sup>1</sup> | Envir<br>Qual<br>Program <sup>2</sup> | Type of Qual.                    | EQ Reports<br>(Reference 7)            | As-Built EQRR<br>(Reference 2) |
|----------------------------|------------------|--------------------------------|---|-----------------------------|---------------------------------------|----------------------------------|--|--------------------------------|
| Electrical Penetration P32 | IDSB-EY-<br>P32Y | Yes                            | Yes/Yes                                     | 2                           | E * S                                 | Type<br>Testing<br>&<br>Analysis | SV4-EY01-VBR-004 /<br>SV4-EY01-VBR-003 | 2.2.01.05.i-U4-<br>EQRR-PCD004 |
| Instrument Penetration P46 | PCS-PY-<br>C01   | Yes                            | -/-   | N/A                         | N/A                                   | Analysis                         | SV4-MV50-S3R-100<br>SV4-CNS-S3R-001    | 2.2.01.05.i-U4-<br>EQRR-PCD002 |
| Instrument Penetration P47 | PCS-PY-<br>C02   | Yes                            | -/-   | N/A                         | N/A                                   | Analysis                         | SV4-MV50-S3R-100<br>SV4-CNS-S3R-001    | 2.2.01.05.i-U4-<br>EQRR-PCD002 |
| Instrument Penetration P48 | PCS-PY-<br>C03   | Yes                            | -/-   | N/A                         | N/A                                   | Analysis                         | SV4-MV50-S3R-100<br>SV4-CNS-S3R-001    | 2.2.01.05.i-U4-<br>EQRR-PCD002 |
| Instrument Penetration P49 | PCS-PY-<br>C04   | Yes                            | -/-   | N/A                         | N/A                                   | Analysis                         | SV4-MV50-S3R-100<br>SV4-CNS-S3R-001    | 2.2.01.05.i-U4-<br>EQRR-PCD002 |

## Notes:

- <sup>+</sup> Excerpt from COL Appendix C Table 2.2.1-1
- 1. See Table 3D.5-1 of UFSAR
- 2. E = Electrical Equipment Program (limit switch and the motor operator, squib operator, solenoid operator)
  - M = Mechanical Equipment Program (valve)
  - S = Qualified for submergence or operation with spray
  - \* = Harsh Environment
- 3. Dash (-) indicates not applicable